

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

EASTERN

District of

VIRGINIA

Division

NOV 28 2018

CLERK, U.S. DISTRICT COURT
RICHMOND, VA*3:18CV823*

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Justin L. Jones

Jury Trial: (check one)

☒ Yes☐ No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Michelle C. Wilson

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Justin Lemar Jones

Street Address

13026 Hull STREET Rd #123

City and County

Midlothian / Chesterfield

State and Zip Code

Virginia 23112

Telephone Number

208 699 5805

E-mail Address	Dynamic.customs@icloud.com
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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Michelle C. Wilson
Job or Title (if known)	Registered Agent
Street Address	4403 New Kent Avenue
City and County	Richmond
State and Zip Code	Virginia 23225
Telephone Number	(804) 748-1278
E-mail Address (if known)	Crimesolvers@chesterfield.gov

Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question	Diversity of citizenship
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Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

47 U.S. Code § 558
(Libel) (Slander) (deformation)

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the
State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____ . Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including

the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.		
	On 3/14/2018, the organization failed to remove a publicated "WANTED" post, that included, the plaintiff, who is self employed, picture, name and Alias. The organization negligently left this fabricated act of libel active for 7 months, Even after being contacted and asked to remove. This post was cross referenced with my bussiness profiles on networks such as LinkedIn, and Facebook. I was harrassed and humiliated.	
IV. Relief	State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.	
	I Request that the Courts award 3x the amount in legal earnings that the plaintiff can prove, in punitive damages to equal \$1,218,652.00 for the 7 months this was published. I also ask the courts to award \$225,000.00 in actual damages, because I was denied Angel investor equity funding because of the post.	
V. Certification and Closing	I am seeking relief to leave the County state, and Coast of Virginia. I am currently still being harrassed because of this post on social networks. I am seeking a total of \$1,043,652.00.	
have	Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.	
A. For Parties Without an Attorney		
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.		
Date of signing: 11/20/2018		
Signature of Plaintiff <i>Justin Jones</i>		
Printed Name of Plaintiff Justin Jones		
B. For Attorneys		
Date of signing:		
Signature of Attorney		
Printed Name of Attorney		
Bar Number		
Name of Law Firm		
Street Address		
State and Zip Code		
Telephone Number		
E-mail Address		

Express Envelope

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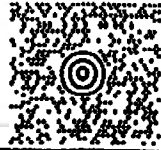
JUSTIN JONES
208-699-5805
JUSTIN JONES
13926 HULL STREET RD
MIDLOTHIAN VA 231122004

1 LBS

1 OF 1

DWT: 12,10,1

SHIP TO:
US DISTRICT COURT HOUSE
US DISTRICT COURT HOUSE
701 E BROAD ST
RICHMOND VA 23219-1833

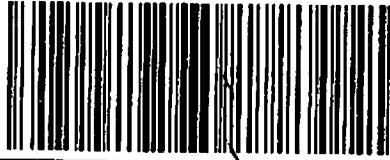


VA 230/2-01



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DISTRICT COURT HOUSE
701 E BROAD ST
RICHMOND VA 23219-1833

BOTTOM S. RIGHT

13C
R08-6945

13926 HULL STREET RD
MIDLOTHIAN VA 231122004

MONEY ORDER
ENCLOSED

701 E Broad ST

Richmond, VA

23219

From: Justin Jones
13926 Hill St. Rd
#123
Middleton, VA
23112